

# **EXHIBIT A**

## Richard Woods

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**From:** Brandon Bogle  
**Sent:** Monday, January 6, 2020 1:28 PM  
**To:** Rice, Dale (drice@cov.com)  
**Cc:** Troy Rafferty; Eric Kennedy <EKennedy@weismanlaw.com> (EKennedy@weismanlaw.com) (EKennedy@weismanlaw.com); William Hawal (whawal@spanglaw.com) (whawal@spanglaw.com)  
**Subject:** RE: CT2 Custodians

Dale, we have reviewed the deposition transcripts you recently produced and we would now like to go ahead and request deposition dates for Elaine Thomet, Tim Ashworth, and Kevin Meunier. I know that you still need to finalize custodial productions for these folks and we will also want the diligence files to be produced before we depose them, but we would like to go ahead and get dates locked in for them. We would like to take all three of these depositions in February. Can you please get us February deposition dates for each of these folks?

Also, we would like to request the custodial file for Karen Lewis using the "All States" terms. We understand served as the Regulatory Affairs Manager with responsibility for Washington Courthouse for some period of time.

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**From:** Brandon Bogle  
**Sent:** Friday, December 20, 2019 3:18 PM  
**To:** Rice, Dale (drice@cov.com)  
**Cc:** Troy Rafferty; Eric Kennedy <EKennedy@weismanlaw.com> (EKennedy@weismanlaw.com) (EKennedy@weismanlaw.com); William Hawal (whawal@spanglaw.com) (whawal@spanglaw.com)  
**Subject:** CT2 Custodians

Dale,

I wanted to follow-up on our call earlier this week specifically on the issue of CT2 custodians we have identified thus far.

We would like to get custodial files using the "All States" terms for Elaine Thomet, Tim Ashworth, Kevin Meunier, Tom Terry, and Todd Spaulding.

We also still need to know whether there are additional retail sales managers, VPGM, or VPs of Sales that had responsibility that included Cabell County from 2006-present. Finally, we need to know who replaced Ed Bissler in his role with the company when Mr. Bissler left. Can you confirm the current status on these requests?

**Brandon Bogle, Attorney**

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